

EXHIBIT A



February 7, 2024

Board of Managers
c/o President Wendy Raymond
Haverford College
370 Lancaster Avenue
Haverford, Pennsylvania 19063

DEMAND LETTER

Dear Board of Managers:

I am the Legal Director of The Deborah Project, on behalf of which I represent Jeffrey and Michele Landau and Ally Landau '24. The Deborah Project is a public interest law firm that asserts and defends the civil rights of Jews facing discrimination in educational settings. I write to demand that the Board of Managers take certain actions, outlined below, to address the severe and pervasive hostile antisemitic environment that exists on the Haverford College campus. If the Board of Managers does not take these actions or direct the relevant representatives of Haverford College to do so, my clients and those other members of the Haverford community with whom they have been in contact have authorized us to prepare for legal action against Haverford College.

As everyone receiving this email should know: Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color or national origin in any program or activity that receives federal funding or other federal financial assistance. Title VI protects all students at Haverford College, including Jewish students under the categories of shared ancestry or ethnic characteristics, as well as national origin. Since at least September 2004, it has been the policy of the Office of Civil Rights of the U.S. Department of Education, the agency responsible for enforcing Title VI, to investigate claims relating to antisemitism. In an October 26, 2010, letter to schools receiving federal funding, the OCR confirmed that each such school must address antisemitic harassment under Title VI. As the OCR stated, antisemitic harassment violates Title VI when it creates a "hostile environment" in which "the conduct is sufficiently severe, pervasive or persistent so as to interfere with or limit a student's ability to participate in or benefit from the services, activities or opportunities offered by the school" or when the harassment is "encouraged, tolerated, not adequately addressed or ignored by school employees."

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The administration of Haverford College, through the action and inaction of President Wendy Raymond, Dean John McKnight and Vice President for Institutional Equity and Access Nikki Young, members of the faculty and others, (the “Administration”) has allowed, and indeed fostered and encouraged, the creation of a severe and pervasive hostile antisemitic environment on Haverford’s campus. Many Jewish students at Haverford have been subject to antisemitic intimidation and harassment, and they fear for their personal and community safety. This hostile environment interferes with the ability of Jewish students to participate in and benefit from the services, activities or opportunities offered by the College.

To date, the Administration has taken no effective action to: (i) address the environment of antisemitic intimidation and harassment; (ii) hold the perpetrators of antisemitic intimidation accountable for their actions; or (iii) prevent further acts of intimidation from occurring. Instead, the Administration has encouraged, tolerated, not adequately addressed or ignored the creation of this severe and pervasive antisemitic environment. Haverford’s deliberate indifference and clearly unreasonable response to anti-Jewish harassment, and its discriminatory application of its policies to exclude Jewish students from their protections, has created an environment in which antisemitic activity has flourished.

The College has long struggled with antisemitism. Dating back to the 1930s, Haverford had a quota on the number (three) of Jewish students who could be in each class. The College apparently had no other quota or limitation on the religious, racial or ethnic makeup of its student body. The College singled out Jewish students as a threat to its perceived mission and makeup. The College’s continuous struggle with antisemitism has manifested itself over time, and once again in 2020 when, during what has become known as the “student strike,” numerous student organizations signed on to a petition to show support for the antiracism objectives of the student strike. However, when a Jewish student group pledged to sign the petition, the group was forbidden to do so by the student strike leaders who told the Jewish students “**get the f*ck off the document**,” and that the Jewish students should “**f*cking choke**.” The Jewish student group was the only student organization that was not allowed to sign the petition. Shockingly, the Administration stood by in silence and took no action, despite numerous direct requests made to President Raymond that action be taken in the face of this obviously antisemitic action. Neither President Raymond nor any other member of the Administration even informed the Board of Managers of this antisemitic conduct, let alone their inexcusable inaction in the face of it. Sadly, this recitation of the College’s failures to effectively respond to antisemitism is not exhaustive.

The impact at Haverford of the October 7th terrorist attack must be assessed against this historical backdrop of antisemitism and the Administration’s refusal to address it.

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In response to Hamas' unprovoked attack, murder, mutilation and rape—including death by rape—and kidnapping of innocent Israelis, the Administration, unlike many other of its peer liberal arts colleges (including Wesleyan and Dartmouth), did not condemn Hamas. Rather, on Monday, Oct. 9th (two days after the genocidal antisemitic Hamas terrorist attack on Israel), Dean McKnight and VP-IEA Nikki Young sent an e-mail on behalf of the Administration to the Haverford student body which compared natural disasters (i.e., earthquakes, hurricanes, and wildfires) to the “outbreak of war in Israel and Gaza,” with no mention of the truth of what occurred on Oct. 7th (a heinous act of antisemitic terrorism committed by the Hamas terrorist group (as designated by the U.S. and other governments)). President Raymond approved this email in advance and the Administration has never retracted it.

Equally disconcerting, is that the Administration has permitted students hostile to Jews and the Jewish State to showcase an avowed antisemite Professor Tarik Aougab as a speaker. On October 8th, the day after the Hamas massacre in southern Israel and before the Israel Defense Forces had even begun an organized response, Professor Aougab praised the terrorist attack and slaughter of Israelis in a social media post. That same professor reposted a “tweet” which says “We should never have to apologize for celebrating these scenes of an imprisoned people breaking free from their chains. This was a historic moment to be recorded in the history books.” The “tweet” included a picture of the Hamas terrorists in bulldozers breaking through the fence at the Israel/Gaza border on their way to commit their acts of antisemitic genocide.

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↑ Tarik reposted



روني الدنماركي @Aldanmarki · 4d

...

**We should never have to apologize for
celebrating these scenes of an
imprisoned people breaking free from
their chains.**

**This was a historic moment to be
recorded in the history books.**



3

↑ 2,685

♡ 8,321

||| 203K

↑

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Professor Aougab is active in the Just Mathematics Collective, which is an antisemitic group that glorifies terrorism and uses their academic skills to hunt and map Jews.

↳ Tarik reposted

Just Mathematics Colle... · 2023-10-11 ...

 **We'll be circulating a piece soon by 2 of our members which takes data from @MappingProj48 & performs a "quantitative power mapping" to rank the nodes in the network of corporations, police orgs, and other entities in the Boston area that support Zionism and apartheid. Stay tuned**

Comment 5 Likes 20 Shares 1,245

Just a few days later, on October 12th, President Wendy Raymond sent an e-mail to the Haverford student body which did not identify, let alone condemn, Hamas as a terrorist organization or describe the attack as fueled by Jew Hatred, which it was, as anyone who has read the Hamas Charter <https://irp.fas.org/world/para/docs/hamas-2017.pdf> ¶20 knows. President Raymond's e-mail also mentioned the "certainty of more devastation to come for Israelis and Palestinians alike" without stating the truth that the Hamas terrorist attack was the actual commencement of war against Israel by Hamas, the governing authority in Gaza.

The statements and omissions of the Oct. 9th and Oct. 12th communications made it clear to Haverford students and faculty what was already clear from the Administration's inaction during the 2020 student strike: that antisemitism is and would continue to be tolerated (and as later observed, encouraged) without fear of response by the Administration or consequences for those who engage in antisemitic speech and conduct.

In response, on the evening of October 12th, Ally Landau '24 requested that President Raymond issue a communication to the Haverford student body condemning antisemitism and the Hamas terror attacks. President Raymond refused, leaving it to Ally Landau, to prepare her own presentation to deliver to the student body. President Raymond effectively delegated her responsibility to address and combat antisemitism to one of the College's students, leaving it to my client, Ally Landau, to explain to the

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College community why Hamas is a terrorist organization that committed an antisemitic act of genocide, and why the State of Israel has a right to exist. This presentation took place on November 1. Not a single member of the College administration attended this presentation during which Ally endured verbal attacks from other Haverford students.

At Haverford, the annual student Plenary plays a pivotal role in social and academic life at the College. It is the event in which the Student Body gathers to, among other things, discuss and vote to ratify the Honor Code. It is the time when all Haverford students are asked to gather as a community. It should be a safe space. But when the Student Council sent an email to the Student Body notifying them of the time and date of Plenary, it also gratuitously affirmed their support for students aligned with the organization Students for Justice in Palestine (“SJP”), and thus against the Jewish students who did not agree with SJP’s antisemitic agenda. This created an environment of intimidation and harassment at Plenary for Jewish students.

Emboldened by the Administration’s fecklessness and refusal to condemn antisemitism, the environment grew even more hostile to Jews on campus when the Student Council arranged the November 5th Plenary meeting and allowed SJP to present its virulently antisemitic point of view, despite the absence of any such item on the written agenda distributed to the Haverford community, prior to the Plenary. This meant that although the SJP students were prepared to present their views, the Jewish students had no idea this would be a topic and so none were prepared or had signed up in advance to speak on this topic. There were multiple SJP speakers at the Plenary all of whom exceeded their allotted time slots. These speakers were permitted to spew hate speech to the student body, holding up placards and repeating “From the River to the Sea, Palestine will be Free,” a phrase understood by Jewish students to be a call for the elimination of Jews and the State of Israel, and which is a direct quote from the Hamas Charter.

Shockingly, again, the Jewish students who then wanted to speak in response to SJP’s antisemitic comments were not given the opportunity by the Student Council leaders to do so. This was yet another flagrant act of antisemitism for which the responsible parties have suffered no consequences. President Raymond and Dean McKnight were present at the Plenary and utterly failed to effectively intervene to allow the Jewish students to speak. By not being allowed to speak following the unannounced attack by SJP at the Plenary, the Jewish students were silenced and subjected to an increasingly toxic and hostile environment.

Despite this, President Raymond validated the antisemitic actions of the anti-Israel students and encouraged and emboldened further acts of harassment and intimidation

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by posting a communication addressing the student body praising Plenary as a “great success.”



In response to being silenced at Plenary and in the face of the Administration’s flaccidity and President Raymond’s praise for the repeated harassment and intimidation of Jewish students, on November 8, 2024, Ally Landau sent a letter “In the name of many concerned Jewish students at Haverford and Bryn Mawr” to the entire Haverford community using the College’s email server, for which she had permission from Dean McKnight. That letter was an effort to respond to the SJP’s otherwise unanswered attacks on the Jewish State at Plenary, and it defended Israel’s right to exist and to its self-determination. Even this effort was turned against the Jewish

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members of the Haverford community when Ally Landau '24, was pilloried by students for daring to use the College's all-campus email service.

Haverford's repeated failure to appropriately condemn or take significant steps to ameliorate antisemitism on campus has emboldened students to engage in increasingly aggressive antisemitic protests, intensifying the hostile environment Jewish students are forced to endure.

The Administration again took no action, despite express requests that it do so, when in violation of College policy anonymous student groups hung posters throughout the campus calling for a revolution that would culminate in Palestine stretching "from the River to the sea."



The SJP Instagram account attached a Statement from Haverford College Faculty for Justice in Palestine that references the "Israeli state's genocidal violence against Gaza," when the truth is that Hamas committed an antisemitic genocidal terrorist attack against Israel and initiated a war. This statement is overtly antisemitic. Other educational institutions have taken actions against faculty members using antisemitic rhetoric, but the Administration has taken no action against these faculty members,

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even though these faculty members are teaching students to adopt hate-filled antisemitic views.

Emboldened by the inaction of the Administration, antisemitic students at Haverford published what they entitled the Haverford Grievances document (“Grievances Document”), an antisemitic screed sent to the student body. This Grievances Document included a direct reference to Ally Landau, a fact that the Administration knew and about which it failed to take action to protect my client. Ultimately, a worried member of the Haverford Community contacted Jeff and Michele Landau and informed them of the potential danger to Ally created by the appearance of her name in the Grievances Document. That was when my clients Michele and Jeff Landau called President Raymond’s office and refused to get off the telephone until she picked up. When President Raymond got on the telephone, my clients insisted that she take action to protect their daughter. Although Ally’s name was removed from the latest version of the online document, it still remains in the PDF version distributed to Haverford students.

Even though the Haverford Grievances Document named and vilified at least one of its students—Ally Landau—the Administration responded to these antisemitic attacks not by discrediting them, but instead by validating and even praising them: President Raymond actually thanked the students for writing and circulating the document.

What’s more, President Raymond chose to publicly compare Ally Landau’s characterization of SJP’s “hijacking” of Plenary to the slogan calling for the extermination of the Jewish State, “From the River to the Sea. That slogan is the parroting of the Hamas Charter which calls for the extermination of the Jewish State and the genocide of the Jewish people. Hijacking a meeting refers to one group taking control and then dominating a meeting—which is what occurred at the Plenary—and is neither a hateful or a violence-inciting slogan. Comparing these two phrases and deeming them equivalent is grossly antisemitic, and it sent a clear message from the Administration to the student body that it will do more than tolerate, it will sanitize and even praise hate speech directed at Jews and the Jewish State.

When a Haverford student was tragically shot and wounded in an unprovoked attack in Vermont, students at Haverford posted on social media that my client, Ally Landau, a Jewish student leader at Haverford, was responsible for the shooting. Although the Administration was well aware of this targeting and personal attack on Ms. Landau, the College did nothing to address the matter, further validating acts of antisemitism and the targeting and harassment of Jewish students. It is beyond disgraceful that at a **student vigil** for the injured Haverford student, Nikki Young, a senior member of the Administration, took it upon herself to accuse Israel of being guilty of genocide.

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Following the vigil, Haverford students occupied and took over Founders Hall and held a sit-in there for approximately a week. They hung antisemitic banners outside Founders Hall that were intended to, and had the effect of, intimidating and harassing Jewish students. As Founders Hall sits on the main quadrangle on campus, adjacent to the library and on the path to the Dining Center, Jewish students were forced to face this harassment daily.

President Raymond effectively condoned the antisemitic activities of the “Sit-in” (including allowing Professor Aougab to address the students) and she praised it as “a recent example of peaceful protest,” along with a promise of “no punitive action” to the participating students. Professor Aougab continues to be employed by the College and continues to teach Haverford students. On November 26, 2023, Haverford College professor Gina Velasco posted (<https://www.facebook.com/mr.peabodycat>) a message which included the terms “F*ck Zionism, F*ckIslamophobia, F*ckAntiArabRacism. Velasco also continues to be employed at Haverford, where she is an associate professor and director of Gender and Sexuality Studies.

And this Administration’s whitewashing, condoning and enabling of antisemitism continues through this week.

Last semester Ally Landau obtained permission and approval from VP Young to dedicate the February 6, 2024, women’s basketball home game to Antisemitism Awareness. Late last week, however, Dean McKnight and Athletic Director Danielle Lynch contacted Ms. Landau and informed her that it would be best if the Antisemitism Awareness designation for the game were removed. The reason given was that it might incite pro-Palestinian Haverford students to charge the floor and disrupt the game. Should security be unable to control the crowd, Haverford would have to forfeit the game, as required by the rules. It would fall to Ally to shoulder the blame if her team were forced to forfeit a game because of outrageous behavior by anti-Israel students.

Haverford has issued at least five sets of policies ostensibly to protect students from discrimination, harassment, and intimidation: (1) Anti-Discrimination, Harassment, and Bias Policy; (2) Social Media Best Practices and Policy; (3) Non-discrimination Statement; (4) Poster Policy; and (5) Events Policy. Haverford, however, refuses to apply these policies in a non-discriminatory manner to protect Jewish students and prevent antisemitism on campus., Haverford selectively enforces its own rules, deeming Jewish victims unworthy of the protections it readily affords non-Jewish ones. Haverford’s clearly unreasonable response to antisemitic discrimination and harassment reflects an egregious double standard, as it is at odds with Haverford’s aggressive enforcement of its policies concerning alleged misconduct, especially any instances of perceived discrimination not involving antisemitism.

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Jewish students at Haverford are acutely aware that solely because of their Jewish identities, the Administration views and treats them as second-class citizens in the Haverford community, undeserving of the protections that Haverford affords non-Jewish students. Because of Haverford's persistent refusal to comply with its obligations to stop discrimination and harassment, Jewish students are deprived of the benefits that non-Jewish students enjoy, including, but not limited to, physical protection; emotional support; a sense of inclusion and belonging; participation in educational, extracurricular, and College-sanctioned social activities; the ability to freely express their Jewish identity in class, written coursework, and on campus; and their right to express their support for and attachment to Israel, their ancestral homeland, where many have friends and family.

Jewish students at Haverford justifiably fear the harassment, discrimination, and intimidation they face, on any given day, from professors and Haverford leadership—who are supposed to teach and guide them—and from their fellow students, who are required but fail to treat them with respect and dignity pursuant to Haverford's policies. As a result of Haverford's deliberate indifference to its hostile educational environment, Jewish students are often unable to focus, study, or perform their course work to the best of their ability, thereby inhibiting their ability to take full advantage of their Haverford education.

Jeff and Michele have sent five letters or emails to the Administration requesting that it take action to address the severe and pervasive antisemitism at Haverford and further requesting that Board Chair Charley Beever and President Raymond share each communication with the Board of Managers. My clients' communications were dated December 8, 2024, December 28, 2024, January 8, 2024, January 12, 2024, and January 26, 2024. In separate discussions with President Raymond and Board Chair Beever, Michele and Jeff Landau asked them to identify any inaccuracies in any of their written communications. Neither President Raymond nor Board Chair Beever identified any inaccuracies. The Administration has taken no action in response to these communications, and they told Michele and Jeff Landau, they would not share them with the Board of Managers. ***I have addressed this letter to the Board of Managers and request a copy be provided to each and every member of the Board of Managers prior to its upcoming February Board Meeting.***

Haverford's deliberate indifference to, and indeed enabling of, antisemitism on campus constitutes an egregious violation of Title VI of the Civil Rights Act of 1964, as well as other antidiscrimination laws and indeed of Haverford's own policies. Haverford must now implement institutional, far-reaching, and concrete remedial measures to address the severe and pervasive antisemitic environment on Haverford and allow Jewish students to take full advantage of their Haverford education. Potential remedial measures include, among other things: (i) creating and enforcing an effective policy

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that prohibits antisemitic conduct by students, faculty and members of the Administration; (ii) imposing disciplinary measures, including the termination of, deans, administrators, professors, and other employees responsible for antisemitic discrimination and abuse, whether because they engage in it or permit it; (iii) imposing disciplinary measures, including suspension or expulsion, against students who engage in such conduct; (iv) adding required antisemitism training for Haverford community members; and (v) refraining from renewing the contract of President Wendy Raymond.

Please be advised that although Ally Landau is set to graduate in May of 2024, my clients are committed to continue to seek change at Haverford going forward, either through immediate action by the Board of Managers or through exercising all or any legal or other recourses. In addition, there are numerous other parents and Haverford alumni who are committed to seeing change at Haverford and will continue to press for it well beyond May 2024.

Given the targeting and intimidation of Jewish students at Haverford, I ask that the Administration and the Board of Managers treat this letter and my clients' communications as confidential. The failure to do so may place the safety of Jewish students in further danger, particularly given the targeting of Jewish students that has taken place in the past, which the Administration has shamefully condoned through inaction.

Finally, you are now on notice that Haverford has a legal duty to preserve and retain all materials relevant to this matter, including electronic communications, text messages, chats and documents. Please consult with your legal counsel to ensure no such materials are deleted or destroyed.

Sincerely,



Lori Lowenthal Marcus
Legal Director, The Deborah Project
Counsel for Jeffrey and Michele Landau and Ally Landau'24

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Copies to be provided to the Haverford College Board of Managers

Charles G. Beever, Chair (via US mail & email)

Michael B. Kim, Vice-Chair

Wendy E. Raymond, President of the College (via US mail & email)

Jesse Lytle, Corporate Secretary of the Board (via US mail & email)

Mark G. Anderson	James Kinsella	Sara Recktenwald
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Steven L. Begleiter	Thien Le	Maurice Rippel
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Amy Taylor Brooks	Don H. Liu	Henry J. Ritchotte
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Brian Cooper	Erica Lurie-Hurvitz	Alex Robinson
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Petra Doan	Rachel Melroy-Husser	Shreyas Shibalal
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Zachary Dutton	Beatrice Mitchell	John D. Spears
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Molly Finn	Kari Nadeau	E. Vincent Warren
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Jonathan M. Gamse	Terry Nance	David M. Wertheimer
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Bruce D. Gorchow	Jennifer S. Perkins	Jerry Williams
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